

**LOCAL BANKRUPTCY FORM 9013-3**

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

**IN RE:**

JOHN MICHAEL BRADLEY and  
REBECCA S. BRADLEY

**Debtor(s)**

WILLIAM G. SCHWAB, Trustee

**Plaintiff(s)/Movant(s)**

**vs.**

JOHN MICHAEL BRADLEY and  
REBECCA S. BRADLEY

**Defendant(s)/Respondent(s)**

**CHAPTER** 12

**CASE NO.** 4 - 15 -bk- 4370

**ADVERSARY NO.**     -     ap-             
(if applicable)

**Nature of Proceeding:** Motion to Dismiss

**Document #:** 35 and 36

**REQUEST TO CONTINUE HEARING/TRIAL WITH CONCURRENCE<sup>1</sup>**

This request must be filed at least twenty-four (24) hours prior to the hearing. All requests must be approved by the Court. Submitting a request is not an automatic continuance.

The undersigned hereby requests a continuance with the concurrence of the opposing party (parties). This is a first request for a continuance.<sup>2</sup>

Reason for the continuance.

Respondents have potentially resolved two of the Trustee's outstanding issues by filing an amended plan and providing proof of insurance. The Trustee needs time to review the insurance documents to determine if the coverage is adequate. Additionally, the Debtor's counsel is inquiring into the status of the payments and the feasibility of the Debtors to come current on their payments.

Contemporaneous with the filing of this request, the undersigned has served a copy of this request upon all counsel participating in this proceeding.

Dated: 8/24/17

Eric James Filer, Esq.

Attorney for Trustee

Name: William G. Schwab

Phone Number: 610-377-5200

<sup>1</sup> No alterations or interlineations of this document are permitted.